

QUALITY ASSURANCE REPORT

PROGRAM YEAR 2014 -2015

Corrective Action Plan (CAP)

FOR

REGION 01



CareerSource Escarosa

Prepared By

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RWB1 Program Monitor's (WT) (WP) (WIA)

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Welfare Transition Program (WT)

Finding Number WT 01-01

Documentation of Hours Recorded on the Job Participation Rate Screen

Applicable references: F.S. 445.010, 45CFR 260.61-62, 45CFR 262, and Florida's Work Verification Plan.

Federal laws and State guidance require that engagement in work activities and participation hours must be documented and auditable. Program staff must enter hours of participation on the Job Participation Rate (JPR) screen in OSST and this data is then used to report performance (participation rates). Eight of the participant case files reviewed had hours archived in the participation rate's full file. Six (75 percent) of the eight case files contained documentation to support the hours for each of the weeks recorded on the JPR screen and two (25 percent) did not.

Response: CareerSource acknowledges this finding.

Corrective Action Performed: Training was conducted on the above date on the appropriate forms of allowable documentation for JPR's to ensure correct work activities are documented by the participant and signed by the assigned supervisor. Training was also conducted to ensure documentation is placed in the participant's case file before entering the information into OSST.

Finding Number WT 01-02

Pre-penalty and Sanction Process

Applicable references: 45 CFR 261.10, 261.12, 261.13, 261.14, F.S. 414.065, Florida Administrative Code 65A-4.205 and Work Penalty Guidance.

Federal law requires the State to initiate its penalty process if a participant refuses to comply with work requirements or fails to comply with his/her signed IRP. If a participant is not complying with the counseling process, an attempt to make oral contact with the participant is required. Also, if a participant is sanctioned as a result of two failures within a 30-day period, a WTP-2292 form must be mailed to the participant and a copy retained in the case file. Participants must also be allowed three working days to report good cause after the second failure has been identified. One participant was sanctioned as a result of two failures within a 30-day period and the Notice of Failure to Demonstrate Satisfactory Compliance Form (WTP-2292) was not mailed.

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Response: CareerSource acknowledges the finding.

Corrective Action Performed: Training was conducted the above date to ensure staff understands that the WTP-2292 form is mailed on every participant that is sanctioned as a result of a two failures in a 30 day period and record the failure in the case file notes.

Other Noncompliance Issues

Medical Deferrals

Applicable reference: F.S. 414.065, Medical Incapacity Guide.

Florida Statutes require a participant to submit a medical note signed by a physician licensed under Florida Statutes Chapters 458 or 459 prior to being granted extended “good cause” for not participating in a countable work activity. Medical deferrals are specific to the participant and should be entered only when documentation has been received and signed by a licensed physician to support the medical deferral. Of the three sampled case files reviewed that had medical deferrals recorded in the OSST system, two (66.7 percent) participants were placed in deferral status on or after receipt of the signed medical forms and one (33.3 percent) was not. In the one instance, the begin date identified for the medical deferral was dated before the physician’s signature date on the medical documentation.

Response: CareerSource acknowledges this noncompliance issue.

Corrective Action Performed: Training was conducted on the above date to ensure staff understands that medical deferrals are not to be entered into OSST until the signed documentation has been received by a licensed physician under Florida Statutes Chapter 458 and 459. Program will enter the deferral into OSST as other to allow participants 10 days to obtain the medical deferral from the physician and make the appropriate detailed case note entry into OSST. It was also mentioned that if the participant’s physician enters the wrong date on the deferral, the deferral must be redone and all costs associated with the completion of the deferral will be the participant’s responsibility.

Employment Verification

Applicable reference: 445.010(f) F.S.

The monitor reviewed nine participant case files with employment activity recorded in the OSST system. Employment verification was retained in seven (77.8 percent) of the nine files and was not retained in two (22.2 percent) case files. Additionally, the dates of employment indicated on documents in five (71.4 percent) of the seven files matched

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the dates entered in OSST and two (28.6 percent) did not.

Response: CareerSource acknowledges this noncompliance issue.

Corrective Action Performed: Training was conducted on the above date to ensure staff understands that the start date **MUST** be entered into OSST and not the hire date.

Workforce Investment Act (WIA)

WIA Formula-Funded Adult and Dislocated Worker Program

Management Review and Operational Practices

The management and operational process review revealed an issue regarding documenting Occupational Completion Points (OCP). It appears that program staff was not following appropriate procedures and protocols for managing how OCPs are determined and recorded in EFM. It appears that the region was using transcripts from the school system to document the OCPs. However, the transcripts did not describe the occupational competencies that qualified the individuals to obtain the specific OCP nor were they linked to particular career and technical programs as described by the Florida Department of Education (DOE).

Response: CareerSource acknowledges this review.

Corrective Action Performed:

- a.) Met with staff responsible for the OCP determination and input. We will implement changes to the method of calculating OCP's.
- b.) OCP's are issued based on the institution or the CTE Curriculum Framework.
- c.) OCP's may not be recognized at some institutions and there for career advisors will note the credits received.

OTHER NONCOMPLIANCE ISSUE

Program Follow-Ups

Applicable references: WIA Resource Guide, TEGL 17-05, and the Follow-up Memorandum entitled "Entering Case Follow-ups in Employ Florida Marketplace" dated March 23, 2007.

Federal and State guidance require quarterly follow-ups for participants exiting WIA programs. Participants who exited the WIA program were to receive 1st, 2nd, 3rd, and 4th quarter follow-up services based on their exit dates during the review period. The files were reviewed to determine if follow-ups were conducted and recorded accurately in EFM. Of the eight case files reviewed of participants that required quarterly follow-up services, two (25 percent) had the required follow-ups conducted timely and six (75 percent) did not.

Response: CareerSource acknowledges this noncompliance issue.

Corrective Action Performed:

- a.) Met with staff responsible for follow-ups and went over policies and procedures on appropriate follow up protocol.
- b.) Scheduled staff training on 8/4/2015 with the internal Management Information System Specialist to conduct training on follow up's and performance measures.
- c.) Conduct quarterly monitoring on all follow –up's to ensure WIA is in compliance with all policy and procedures.

WIA Formula Youth Program

Finding Number WIA 01-03

Post-Test Assessments

Applicable reference: TEGL 17-05 and FG 062.

Federal and State guidance require all youth participants be assessed for basic skills sufficiency/deficiency and the results of the assessments accurately recorded in the State's MIS. Youth determined basic skills deficient (BSD) as a result of the initial pre-test assessments must also be post-tested by their anniversary date or prior to exit from the youth program. The assessment scores must be recorded in the Literacy/Numeracy table in EFM and a copy of the test results must be retained in the participant case files.

Of the 10 youth who were required to be post-tested, nine (90 percent) files contained documentation that a post-test assessment was completed and one (10 percent) did not. Additionally, a BSD youth was not timely post-tested by the anniversary date of their first youth activity and a pre-test assessment was not maintained in another participant's case file.

Response: CareerSource and Youth provider acknowledges this finding.

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Corrective Action Performed: This was an older handed down case from the previous Youth Coordinator, who apparently neglected to give the participant the timely post test by their anniversary date. Future problems in this area have been resolved by the current Youth Coordinator as he and his Staff is fully trained on every aspect of this requirement.

WAGNER-PEYSER PROGRAM (WP)

Finding Number WP 01-04

Alien Labor Certification H-2B Job Orders

Applicable reference: Immigration Reform and Control Act, 09-01 Clarification to the Communiqué on Referral Procedures for H-2B Job Orders issued January 23, 2009; Federal Regulations 8 CFR 274a.6; and U.S. Citizenship and Immigration Services I-9 Employer Handbook.

Federal law and State guidance require career center staff to complete both an I-9 and 516 INS form for staff referrals on all H-2B job orders. Additionally, the 516 INS form is to be signed in the presence of the employer and the original Form I-9 and a copy of the 516 INS stay on file at the issuing career center. The one staff referred H-2B job order did not have the required I-9 and 516 forms completed and on file.

Response: CareerSource Escarosa acknowledges this finding.

Corrective Action Performed:

- a.) Met with staff responsible for the job order referrals and reviewed H-2B job orders and the appropriate forms that need to be completed when such referrals are made, (completion of I-9 and form 516 INS). Reviewed the 07/18 Communiqué and the presentation on processing I-9 forms located on the DEO website and also the U.S. Citizenship and Immigration Services I-9 Handbook. Attendance Sheet Attached) <http://www.floridajobs.org/workforce-board-resources/professional-development-and-training/training-materials>
<http://www.uscis.gov/files/form/m-274.pdf>
- b.) Business Service Specialist has been instructed to maintain a log of all H-2B job orders.
- c.) Have requested from Geosol that a prompt be added to all H-2B job orders notifying user of the H-2B status.
- d.) Created and issued a desktop checklist as a quick reference guide.

Finding Number WP 01-05

Initial Assessments

Applicable references: UI Handbook-NO. 401-ETA 9048 and Federal Regulation 20 CFR 651.10.

An initial assessment must be documented with the barriers, strengths, weaknesses, skills, etc., on the notes screen in EFM or on a paper copy document. Of the 14 instances where an initial assessment service was recorded in the system, 13 (92.9 percent) had documentation in the case notes or in paper copy form to support the initial assessment services given and one (7.1 percent) did not.

Response: CareerSource Escarosa acknowledges this finding.

Corrective Action Performed:

- a.) Reviewed Initial Assessment requirements from DEO's employment counseling guidance during Veteran Staff training on 07/22/2015 and issued an Initial Assessment template to ensure proper documentation of Initial Assessment. (Attendance Sheet Attached).

Finding Number WP 01-06

Migrant and Seasonal Farm worker (MSFW) 511N Forms

Applicable references: 20 CFR 653.103 and DEO FG 03-040.

DEO Guidance requires that MSFWs be provided with information on the services available through the career centers and given a DEO 511N form acknowledging that the services have been discussed. The one file coded as a MSFW job seeker did not have documentation to support that a 511N form had been explained and issued.

Response: CareerSource Escarosa acknowledges this finding.

Corrective Action Performed:

- a.) Discussed with staff responsible for new client registration the importance of educating MSFW clients about the services available and opportunities available to them through the Regional Workforce Board System. Issued the Migrant Farm Worker, Seasonal Farm Worker, Migrant Food Processing Worker Desk Aid and DEO form 511N. (Attendance Sheet Attached)
<http://www.floridajobs.org/PDG/MSFW/MSFWDeskAid.pdf>
http://www.floridajobs.org/PDG/MSFW/511N_english.pdf